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7 Attorneys for Plaintiff Jeffrey I. Golden,  
Chapter 7 Trustee

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9 **UNITED STATES BANKRUPTCY COURT**  
10 **CENTRAL DISTRICT OF CALIFORNIA**

11 **SANTA ANA DIVISION**

12 In re Case No. 8:21-bk-11710-SC  
13 JAMIE LYNN GALLIAN, Chapter 7  
14 Debtor.

15 JEFFREY I. GOLDEN, Chapter 7 Trustee,

16 Plaintiff,

17 vs.

18 J-SANDCASTLE CO., LLC; J-PAD LLC;  
19 STEVEN D. GALLIAN; BRIAN J.  
GALLIAN; JUSTIN BARCLAY; RONALD  
20 J. PIERPONT; ROBERT J. MCLELLAND;  
AND E.J. GALLIAN,

21 Defendants.

22 Adv. No. 8:23-ap-01064-SC

23 **NOTICE OF ERRATA RE MOTION FOR**  
**DEFAULT JUDGMENT UNDER LBR**  
**7055-1 (RONALD J. PIERPONT)**

24 Date: May 7, 2024

Time: 1:30 p.m.

Place: Courtroom 5C

411 W. Fourth Street  
Santa Ana, California 92701

25 TO THE HONORABLE JUDGE SCOTT C. CLARKSON, DEFENDANTS, AND INTERESTED  
26 PARTIES:

27 PLEASE TAKE NOTICE that on March 27, 2024, Jeffrey I. Golden, the Chapter 7 Trustee  
for the bankruptcy estate of Jamie Lynn Gallian (“Plaintiff”), filed his Motion for Default  
Judgment Under LBR 7055-1 against Ronald J. Pierpont (the “Motion”) (*docket no. 58*).  
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The Plaintiff unintentionally failed to attach a copy of the proposed default judgment to the Motion. A copy of the proposed default judgment that Plaintiff will lodge and serve on Ronald J. Pierpont in connection with the Motion is attached as Exhibit A hereto.

DATED: April 4, 2024

DANNING, GILL, ISRAEL & KRASNOFF, LLP

By: /s/ Aaron E. de Leest

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AARON DE LEEST  
SHANTAL MALMED  
Attorneys for Plaintiff Jeffrey I. Golden,  
Chapter 7 Trustee

## EXHIBIT A

1 ERIC P. ISRAEL (State Bar No. 132426)  
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7 Attorneys for Plaintiff Jeffrey I. Golden,  
Chapter 7 Trustee  
8

9 **UNITED STATES BANKRUPTCY COURT**  
10 **CENTRAL DISTRICT OF CALIFORNIA**  
11 **SANTA ANA DIVISION**

12 In re Case No. 8:21-bk-11710-SC  
13 JAMIE LYNN GALLIAN, Chapter 7  
14 Debtor.

15 JEFFREY I. GOLDEN, Chapter 7 Trustee, Adv. No. 8:23-ap-01064-SC  
16 Plaintiff,  
17 vs.  
18 J-SANDCASTLE CO., LLC; J-PAD LLC;  
19 STEVEN D. GALLIAN; BRIAN J.  
GALLIAN; JUSTIN BARCLAY; RONALD  
20 J. PIERPONT; ROBERT J. MCLELLAND;  
AND E.J. GALLIAN,  
21 Defendants.

22  
23 [PROPOSED] DEFAULT JUDGMENT  
24 AGAINST RONALD J. PIERPONT

Date: May 7, 2024  
Time: 1:30 p.m.  
Place: Courtroom 5C  
411 W. Fourth Street  
Santa Ana, California 92701

25 On May 7, 2024, the Court heard and considered the Plaintiff's Motion for Default  
26 Judgment under LBR 7055-1 against Defendant Ronald J. Pierpont (the "Motion") filed by Plaintiff  
Jeffrey I. Golden, as the Chapter 7 Trustee (the "Trustee" or "Plaintiff") for the bankruptcy estate  
of Jamie Lynn Gallian (the "Debtor").  
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1       The Court having read and considered the Motion, having found that notice of the Motion  
2 was adequate and proper, having noted the lack of any response and that the Clerk of the Court  
3 entered the default of Defendant Ronald J. Pierpont (“Defendant”) on August 22, 2023, and good  
4 cause appearing:

5           IT IS ORDERED, ADJUDGED AND DECREED THAT:

6           1.       The Motion is granted.

7           2.       Default judgment is entered in favor of the Plaintiff and against the Defendant on  
8 the Plaintiff’s fifth and sixth claims for relief in the Complaint.

9           3.       Defendant is not a party to any security agreement or agreements that would grant  
10 Defendant a security interest in or lien on the manufactured home located at 16222 Monterey Lane,  
11 Space #376, Huntington Beach, CA 92649, Decal # LBM1081, Serial # AC7V710394GA,  
12 AC7V710394GB (the “Property”).

13           4.       Defendant has no interest in the Property.

14           5.       Defendant does not have any valid, perfected, and unavoidable liens on the  
15 Property.

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2       6. The transfers to the Defendant, including the following UCC Financing Statement  
3 Amendments (UCC-3) and any liens on the Property in favor of the Defendant, are avoided and  
4 preserved for the benefit of the Debtor's estate.

UCC Filing Date	UCC Type	Filing No.
12/4/2020	UCC-3 Amendment	U200034803831
9/8/2021	UCC-3 Amendment	U210083394336
9/8/2021	UCC-3 Amendment	U210083400018
9/12/2021	UCC-3 Amendment	U210084251426
9/12/2021	UCC-3 Amendment	U210084255728
9/12/2021	UCC-3 Amendment	U210084256326
9/24/2021	UCC-3 Amendment	U210088103629

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## PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is 1901 Avenue of the Stars, Suite 450, Los Angeles, CA 90067-6006.

A true and correct copy of the foregoing document entitled (*specify*): NOTICE OF ERRATA RE MOTION FOR DEFAULT JUDGMENT UNDER LBR 7055-1 (RONALD J. PIERPONT) will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) April 4, 2024 I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

Service information continued on attached page.

**2. SERVED BY UNITED STATES MAIL:**

On (*date*) April 4, 2024, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

Service information continued on attached page.

**3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state**

method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) \_\_\_\_\_, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

Service information continued on attached page.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

April 4, 2024

Date

Beverly Lew

Printed Name

/s/ Beverly Lew

Signature

ADDITIONAL SERVICE INFORMATION (if needed):

**1. SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING ("NEF")**

- **Bradford Barnhardt** bbarnhardt@marshackhays.com, bbarnhardt@ecf.courtdrive.com, alinares@ecf.courtdrive.com
- **Aaron E. DE Leest** adeleest@DanningGill.com, danninggill@gmail.com; adeleest@ecf.inforuptcy.com
- **Robert P Goe** kmurphy@goforlaw.com, rgoe@goforlaw.com; goeforecf@gmail.com
- **Jeffrey I Golden (TR)** lwerner@go2.law, jig@trustesolutions.net; kadele@go2.law; C205@ecfcbis.com
- **D Edward Hays** ehays@marshackhays.com, ehays@ecf.courtdrive.com; alinares@ecf.courtdrive.com; cmendoza@marshackhays.com; cmendoza@ecf.courtdrive.com
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- **Laila Masud** lmasud@marshackhays.com, lmasud@ecf.courtdrive.com; lbuchanan@marshackhays.com; alinares@ecf.courtdrive.com
- **United States Trustee (SA)** ustpregion16.sa.ecf@usdoj.gov

**2. SERVED BY U.S. MAIL**

Ronald J. Pierpont  
4519 Ponderosa Way  
Yorba Linda, CA 92886

The Honorable Scott C. Clarkson  
U.S. Bankruptcy Court  
Ronald Reagan Federal Building  
411 W. Fourth Street, Suite 5130  
Santa Ana, CA 92701